

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CORNELIUS HILL	:	
and	:	
TRUDIE HASTINGS HILL H/W	:	
Plaintiffs	:	
v.	:	
Schiffahrtsgesellschaft MS Priwall	:	No. 02-CV-2713
mbH & Co. KG	:	
and	:	
Reederei F. Laeisz G.m.b.h.,	:	
Rostock	:	

NOTICE OF MOTION

To: Charles W. McCammon, Esquire
Rawle & Henderson LLP
The Widener Building
One South Penn Street
Philadelphia, PA 19107

Please take notice that the enclosed unopposed Motion for
Continuance is being filed with the Clerk's Office.

E. ALFRED SMITH & ASSOCIATES

E. Alfred Smith
Attorney for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CORNELIUS HILL	:	
and	:	
TRUDIE HASTINGS HILL H/W	:	
Plaintiffs	:	
v.	:	
Schiffahrtsgesellschaft MS Priwall	:	No. 02-CV-2713
mbH & Co. KG	:	
and	:	
Reederei F. Laeisz G.m.b.h.,	:	
Rostock	:	

ORDER

AND NOW THIS, day of ,
2003, upon consideration of plaintiffs' unopposed Motion, it is
hereby **ORDERED** that this case will not go into the Court's jury
trial pool until September 15, 2003.

Michael M. Baylson	U.S.D.J.
--------------------	----------

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CORNELIUS HILL	:	
and	:	
TRUDIE HASTINGS HILL H/W	:	
Plaintiffs	:	
v.	:	
Schiffahrtsgesellschaft MS Priwall	:	No. 02-CV-2713
mbH & Co. KG	:	
and	:	
Reederei F. Laeisz G.m.b.h.,	:	
Rostock	:	

MOTION FOR CONTINUANCE

Plaintiffs respectfully move this Court for an Order delaying the time this case will be put into the Court's jury trial pool by two months and assign in support thereof the following:

1. Plaintiff and his wife are scheduled to depart on July 12, 2003 for a two-week business/vacation trip to San Juan, Puerto Rico.

2. The business portion is to attend the annual meeting of the International Longshoremen's Association, and plaintiff is an officer of Local No. 1291.

3. This trip was planned and paid for several months ago, long before this Court ordered this case to go into its jury pool on July 11, 2003.

4. Plaintiffs' counsel is planning to spend all or most of the month of August with his children and grandchildren in a condominium in Longboat Key, Florida.

5. The arrangements for this were made last fall; the condominium has been paid for, and the children have made vacation plans to be with their father in Longboat Key in August.

6. No prejudice to either party will be experienced by this delay, and defense counsel has no objection to the Court's granting this Motion.

WHEREFORE, plaintiffs request the Court to enter the Order submitted.

E. ALFRED SMITH & ASSOCIATES

E. Alfred Smith
1333 Race Street, 2nd Floor
Philadelphia, PA 19107
(215) 569-8422
Attorney for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

CORNELIUS HILL	:	
and	:	
TRUDIE HASTINGS HILL H/W	:	
Plaintiffs	:	
v.	:	
Schiffahrtsgesellschaft MS Priwall	:	No. 02-CV-2713
mbH & Co. KG	:	
and	:	
Reederei F. Laeisz G.m.b.h.,	:	
Rostock	:	

MEMORANDUM OF LAW

For the reasons set forth in Plaintiffs' Motion, which is unopposed, the Motion should be granted.

Respectfully,

E. Alfred Smith
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has, on this date, caused a true and correct copy of Plaintiffs' Motion For Continuance to be served by first class mail, postage prepaid, on the date listed below upon the following party or counsel of record:

Charles W. McCammon, Esquire
Rawle & Henderson LLP
The Widener Building
One South Penn Street
Philadelphia, PA 19107
Counsel for Defendants
Schiffahrtsgesellschaft MS Priwall mbH & Co. KG
Reederei F. Laeisz G.m.b.h., Rostock

E. Alfred Smith
Attorney for Plaintiffs
Cornelius Hill and Trudie Hastings
Hill

Date: